

## Local Government Perspectives on Siting Criteria for Localized Air Pollution Sources

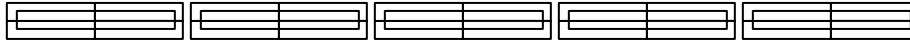
***“How do cities balance the goals of creating housing and employment opportunities, revitalizing abandoned and neglected former industrial and strip-commercial sites, reduce traffic congestion, improve the over-all quality of life in the community, with the goals of eliminating community exposure to source-specific and cumulative air pollution impacts?”***



## Constraints

- Cities face a variety of competing priorities and policies. Reducing air quality impacts is one of many.
- Past planning and development practices are difficult to correct – especially in developed urban areas.

For example, Interstate Highway System came into being in the 1950's – two decades before NEPA and CEQA review. Highways were cut through residential neighborhoods, parks, schools and other sensitive land uses.
- There has been silent transformation of the regional and state economy – to trade dependency – with the attendant port, rail, highway, warehousing and employment growth.



## Constraints

- The Housing Crisis is real. The State is in the 12<sup>th</sup> consecutive year of under-producing housing, with a shortage of 100,000 units yearly statewide.
- It is extremely difficult to find “infill housing” sites in urban areas. Developers are forced by the economics of land prices to concentrate on “brownfields” and former “strip-commercial” areas.
- These are the same areas that cities need to revitalize.
- The jobs-housing imbalance is real. Californian’s are find affordable housing on the urban fringes, spending hours commuting to work.



## Localized Sources of Air Pollution and Sensitive Sites Are Diverse and Widespread Over the Urban Landscape

- ARB list hundreds of uses as having the potential to create localized air pollution – shopping centers, schools, universities, airports, ports, freeways, rail yards and warehouses.
- Commercial and industrial uses include dry cleaners, gas stations, auto body shops, furniture repair, assembly plants, welders, metal spray, chemical producers and assembly plants.
- ARB lists housing, schools, day care centers, playgrounds, hospitals, youth centers and elder care centers as sensitive uses.
- ***All of these are intertwined in the existing urban setting.***

## Distance Recommendations Could Render Miles of Urban Areas Unusable for Housing or Business Development

- | <u>Source</u>         | <u>Distance</u> |
|-----------------------|-----------------|
| • Rail Yard           | • 1 mile        |
| • Intermodal Facility | • 1 mile        |
| • Ports               | • 1 mile        |
| • Roadways (Trucks)   | • 1000 feet     |
| • Truck Stop          | • 1000 feet     |
| • Cold Storage        | • 1000 feet     |
| • Chrome platers      | • 500 feet      |
| • Freeways            | • 500 feet      |

## Practicality and Costs of Mitigations Must Be Weighed

- |  |   |
|--|---|
| <p>Limit Mixed Use Housing</p> <p>Limit Housing Adjacent to Rail</p> <p>Limit Housing Adjacent to Highways</p> <p>Construct alternative truck routes</p> <p>Creation of open space zones</p> <p>Prohibition of housing “downwind” of industrial areas</p> <p>Prohibit truck idling at supermarkets</p> | <p>Limit the amount of gasoline sold in mixed-use developments</p> <p>Install landscaping at construction sites prior to grading</p> <p>Require businesses to purchase low emission vehicles as part of approvals</p> <p>Enhance building ventilation and filtering systems in schools and senior care centers.</p> |
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## Recommendations

- The constraints and opportunities for newly developing areas are different from urban “infill” areas.
- It will be difficult to develop guidelines for “infill” development – flexibility, time and incentives will be required.
- The ARB will have to balance air guidelines with the need to develop housing – especially affordable housing. The ARB should not adopt guidelines that work against key State and local government goals.
- Brownfields, marginal industrial and strip-commercial sites represent a tremendous opportunities to construct housing and revitalize communities. The guidelines need to recognize this opportunity.
- The cost and practicality of the guidelines must be measured.
- Cities want to continue to work with ARB to reduce and eliminate the major regional sources of air pollution – including continued funding for Diesel Toxins Reduction Program.